

*Final*

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*Prepared for*

**July 2009**

## ACRONYMS AND ABBREVIATIONS

## **FINDING OF NO SIGNIFICANT IMPACT**

### **1.0 NAME OF THE PROPOSED ACTION**

Army and Air Force Exchange Service (AAFES) Gas Station at Creech Air Force Base (AFB).

### **2.0 DESCRIPTION OF THE PROPOSED ACTION AND NO-ACTION ALTERNATIVE**

AAFES proposes to construct a gas station on Creech AFB. The gas station would include a single pump filling station on a concrete slab with a weather overhang. Gasoline will be stored in an underground storage tank meeting regulations for spill containment measures. The proposed action would add the filling station service to the base; the service does not currently exist on Creech AFB. AAFES considered three alternative siting locations (including the proposed site) and alternative storage tank design. In addition, to the proposed action, the no-action alternative was also analyzed. Under the no-action alternative, AAFES would not construct a gas station on Creech AFB at this time.

### **3.0 SUMMARY OF ENVIRONMENTAL CONSEQUENCES**

The Environmental Assessment (EA) provides an analysis of the potential environmental consequences resulting from implementation of the proposed action. Thirteen resource categories were investigated and six; air quality, soils and water, biological resources, socioeconomics, land management and use, and hazardous materials and waste management, were thoroughly analyzed to identify potential impacts. Cultural resources, noise, health and safety, transportation, environmental justice, and floodplains were evaluated and were determined not to be affected by the proposed action. According to the analysis in this EA, implementation of the proposed action would not result in significant impacts to any resource category. The potential impacts under the proposed action and the no-action alternative are summarized below.

***Air Quality.*** Impacts to air quality associated with construction activities would be short-term and contribute less than 0.01 percent to the regional air emissions, thereby resulting in no adverse impacts to regional air quality. Under the no-action alternative, impacts to air quality would not be expected since baseline emissions would remain unchanged; therefore, implementing the no-action alternative would not result in adverse effects to the regional air quality.

***Soils and Water Resources.*** No long-term adverse impacts to soils or surface water would occur; slight impacts would be short-term resulting in negligible effects. Groundwater sources would not be affected from construction activities associated with the proposed action. Under the no-action alternative, the gas station would not be constructed on Creech AFB at this time; therefore, impacts to these resources beyond baseline conditions would not be expected.

**Biological Resources.** No impacts to vegetation or wildlife would be expected. No threatened, endangered, or sensitive species are known to occur on the proposed AAFES Gas Station site on Creech AFB. Under the no-action alternative, no changes to existing biological resources would occur since the proposed construction would not take place.

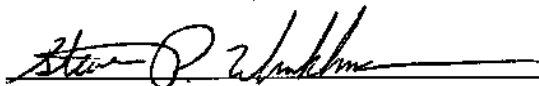
**Socioeconomics.** A short-term, positive input into the regional economy would occur during the construction period. The proposed action may result in a loss of fuel sales at the two gas stations in Indian Springs; however, the influx of personnel associated with the Unmanned Aerial Systems (UAS) force structure changes would likely offset the potential losses resulting in no significant impact. No changes would be anticipated with implementation of the no-action alternative.

**Land Management and Use.** Land use designation would change from Open Space to Community Commercial. This change would not be inconsistent with the overall land use planning of Creech AFB. No impacts or change to land use designation would occur under the no-action alternative.

**Hazardous Materials and Waste Management.** No changes to hazardous materials or waste streams would occur. No Environmental Restoration Program (ERP) sites would be disturbed as none are found in the project area. Best management practices along with leak detection systems installed for the underground storage tank would minimize impacts for this action. No impacts to the handling of hazardous materials or waste management would occur through implementation of the no-action alternative since the AAFES Gas Station would not be constructed.

#### 4.0 FINDINGS

On the basis of the findings of the EA, conducted in accordance with the requirement of the National Environmental Policy Act, the Council on Environmental Quality regulations, and Air Force Instruction 32-7061 as promulgated in 32 Code of Federal Regulations Part 989, and after careful review of the potential impacts of the proposed action and no-action alternative, I find that there would be no significant impact on the quality of the human or natural environment from the implementation of the proposed action or no-action alternative described in the EA. Therefore, I find there is no requirement to develop an Environmental Impact Statement.

  
STEVEN P. WINKLMANN  
Colonel, USAF  
Vice Commander, 99th Air Base Wing

18 Aug 03  
Date

**COVER SHEET**  
**AAFES GAS STATION AT CREECH AIR FORCE BASE**  
**ENVIRONMENTAL ASSESSMENT**

**Responsible Agency:**

**Proposed Action:**

**Designation:**

**Abstract:**

*Final*

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**July 2009**

# EXECUTIVE SUMMARY

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## **EXECUTIVE SUMMARY**

---

*et seq.*

*The Environmental Impact Analysis Process*

### **PURPOSE AND NEED FOR THE AAFES GAS STATION**

### **PROPOSED ACTION AND ALTERNATIVES**



## **MITIGATION MEASURES**

## **SUMMARY OF POTENTIAL ENVIRONMENTAL IMPACTS**

*Air Quality.*

*Soils and Water Resources.*

*Biological Resources.*

*Socioeconomics.*

*Land Management and Use.*

*Hazardous Materials and Waste Management.*

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# **CHAPTER 1**

## **PURPOSE AND NEED FOR THE PROPOSED ACTION**

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# **CHAPTER 1**

## **PURPOSE AND NEED FOR THE PROPOSED ACTION**

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### **1.1 INTRODUCTION**

*et seq.*

*The Environmental Impact Analysis Process*

### **1.2 BACKGROUND**

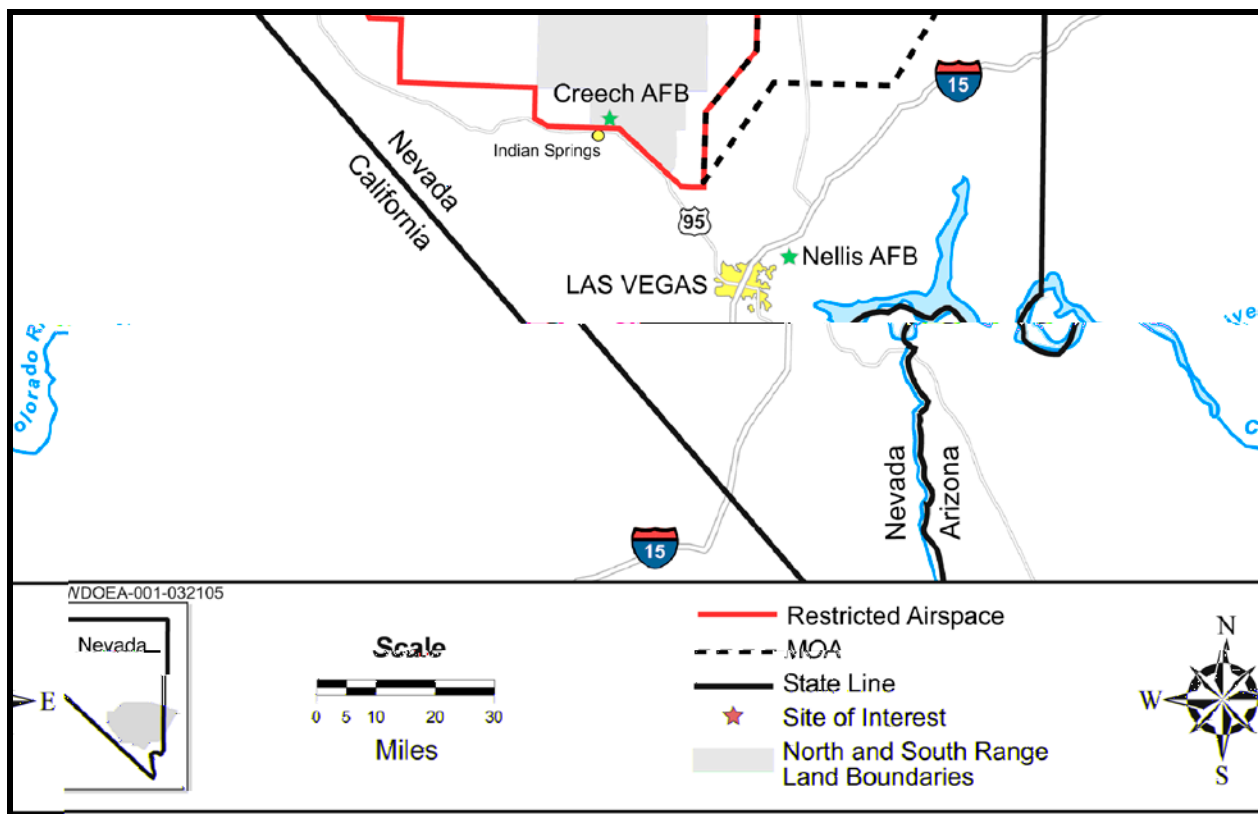


Figure 1-1. Nellis AFB and Creech AFB Location Map



### **1.3 PURPOSE AND NEED FOR THE PROPOSED ACTION**



## **CHAPTER 2**

# **DESCRIPTION OF THE PROPOSED ACTION AND NO-ACTION ALTERNATIVE**

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## CHAPTER 2

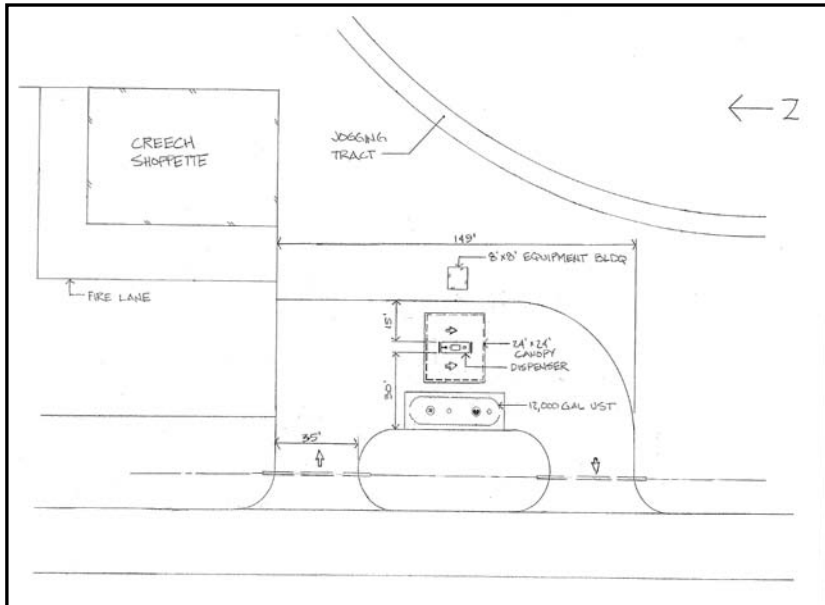
### DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

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#### 2.1 PROPOSED ACTION AND ALTERNATIVES



Figure 2-1 Proposed Action and Alternative Locations



**Figure 2-2 Conceptual Site Layout**

- *Department of Defense Minimum Antiterrorism Standards for Buildings*
- *Facility Planning and Design Guide*  
*Design and Construction Standards and Execution of Facility Construction Projects*  
*Facilities Requirements* *Fire Protection Engineering for Facilities*
- *Pavement*  
*Design for Roads, Streets, Walks and Open Storage Areas*

- 

- 

*Tanks*

*Underground Storage*

### **2.1.1 Alternatives**

## **2.2 NO-ACTION ALTERNATIVE**

## **2.3 ENVIRONMENTAL IMPACT ANALYSIS PROCESS**

*Conduct Interagency and Intergovernmental Coordination for Environmental Planning (IICEP).*

*Prepare a draft EA and Finding of No Significant Impact (FONSI).*

*Announce that the draft EA and draft FONSI have been prepared.*

*Provide a public comment period.*

*Prepare a final EA.*

*Issue a FONSI*

## 2.4 OTHER REGULATORY AND PERMIT REQUIREMENTS

Table 2.1 Review and Permit Requirements		
<i>Type of Permit or Regulatory Requirement</i>	<i>Issue</i>	<i>Administering Agency</i>

## 2.5 MITIGATION MEASURES



## **2.6 SUMMARY OF POTENTIAL ENVIRONMENTAL IMPACTS**

*Air Quality.*

*Soils and Water Resources.*

*Biological Resources.*

*Socioeconomics.*

*Land Management and Use.*

*Hazardous Materials and Waste Management.*

## **CHAPTER 3**

# **DESCRIPTION OF THE AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES**

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## **CHAPTER 3**

# **DESCRIPTION OF THE AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES**

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### **3.1 ANALYSIS APPROACH**

**Affected Environment**

**Resources Analyzed**

Table 3-1. Resources Analyzed in the Environmental Impact Analysis Process		
<i>Resource</i>	<i>Potentially Affected by Proposed Action Activities</i>	<i>Analyzed in this EA</i>

**Resources Eliminated from Further Analysis**

***Cultural Resources***

*Archaeological Survey of the Indian Springs Air Force Auxiliary Field*

***Noise***

*Health and Safety*

*Transportation*

*Environmental Justice and Protection of Children*

*Federal Actions to Address Environmental Justice in Minority and  
Low-Income Populations*

*Protection of Children from Environmental Health Risks  
and Safety Risks (Protection of Children)*

*Floodplains*

## **3.2 AIR QUALITY**





### **3.2.1 Affected Environment**

#### *Base Environment*

#### *Regional Environment*



Table 3-2. Summary of Baseline and Proposed Action Emissions at Creech AFB (tons/year)					
	<i>CO</i>	<i>VOCs</i>	<i>NO<sub>x</sub></i>	<i>SO<sub>x</sub></i>	<i>PM<sub>10</sub><sup>1</sup></i>

Sources

Notes

### Construction

*Operations*

*Emission Estimation Software*

*Tanks 4.09D, Tank*

**No-Action Alternative**

**3.3 SOILS AND WATER RESOURCES**

*Protection of Wetlands.*

*Wetlands Delineation Manual*

### **3.3.1 Affected Environment**

#### **Soils**

#### **Water Resources**

##### *Groundwater*

<b>Table 3-3. Annual Allocations for Creech AFB Wells</b>			
<i><b>Well</b></i>	<i><b>Municipal Allocation in AFY (million gpy)</b></i>	<i><b>Industrial Allocation in AFY (million gpy)</b></i>	<i><b>Total Allocation in AFY (million gpy)</b></i>
<b>Total</b>	<b>103.5 (33.7)</b>	<b>89.07 (29.0)</b>	<b>192.60 (62.7)</b>

*Source*                      *Water Requirements Study of the Nellis Air Force Range (*

### *Surface Water*

### *Stormwater*

## **3.3.2 Environmental Consequences**

**Proposed Action**

**Soils**

**Water Resources**

*Groundwater.*

*Surface Water.*

**No-Action Alternative**

### **3.4 BIOLOGICAL RESOURCES**

*et al.*

*Vegetation*

*, Soils and Water Resources*

*Wildlife*

*Special-Status Species*



### 3.4.1 Affected Environment

#### Vegetation

	<i>Larrea tridentata</i> )	<i>Ambrosia dumosa</i>	
	<i>Atriplex</i>	<i>A. confertifolia</i>	<i>A. polycarpa</i>
	<i>Gutierrezia sarothrae</i>	<i>Eriogonum</i>	
<i>Hymenoclea salsola</i>			<i>Salsola</i>

#### Wildlife

			<i>Lepus</i>
<i>californicus</i>	<i>Neotoma lepida</i>	<i>Dipodomys</i>	<i>Canis latrans</i>
	<i>Vulpes macrotis arsipus</i>		
	<i>Pipistrellus hesperus</i>	<i>Myotis californicus</i>	
		<i>Dipsosaurus dorsalis</i>	
<i>Callosaurus draconoides</i>	<i>Uta stansburiana</i>	<i>Phrynosoma</i>	
	<i>Cnemidophorus tigris</i>	<i>Gopherus agassizii</i>	
	<i>Lampropeltus getulus</i>	<i>Lichanura trivirgata</i>	
	<i>Pituophis melanoleucus</i>	<i>Crotalus scutulatus</i>	
	<i>Oreoscoptes montanus</i> )	<i>Zenaida</i>	
<i>macroura</i>	<i>Corvus corax</i>	<i>Geococcyx californianus</i>	
		<i>Aquila chrysaetos</i>	



**Proposed Action**

**No-Action Alternative**

**3.5 SOCIOECONOMICS**

**3.5.1 Affected Environment**

### **3.5.2 Environmental Consequences**

#### **Proposed Action**

**No-Action Alternative**

**3.6 LAND MANAGEMENT AND USE**

**3.6.1 Affected Environment**

**3.6.2 Environmental Consequences**

**Proposed Action**

**No-Action Alternative**

**3.7 HAZARDOUS MATERIALS AND WASTE MANAGEMENT**

*Federal Compliance with Pollution Control Standards*

**3.7.1 Affected Environment**

*General AST and UST Considerations*

- 
- 
- 
- 

*Environmental Quality Manual,*

- 
- 
-

Table 3-4. Comparison of ASTs and USTs		
<i>Tank System</i>	<i>Advantages</i>	<i>Disadvantages</i>
ASTs	<ul style="list-style-type: none"><li>•</li><li>•</li><li>•</li><li>•</li></ul>	<ul style="list-style-type: none"><li>•</li><li>•</li><li>•</li><li>•</li><li>•</li><li>•</li><li>•</li></ul>
USTs	<ul style="list-style-type: none"><li>•</li><li>•</li><li>•</li><li>•</li><li>•</li></ul>	<ul style="list-style-type: none"><li>•</li><li>•</li><li>•</li><li>•</li></ul>

### 3.7.2 Environmental Consequences

#### Proposed Action

#### *Hazardous Materials and Waste*



*UST Fuel System*

- 
- 
- 
- 

**Alternative A**

*AST Fuel System*

- 
- 
- 
- 
- 
- 
- 
- 

**No-Action Alternative**

## **CHAPTER 4**

# **CUMULATIVE EFFECTS AND IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES**

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## **CHAPTER 4**

### **CUMULATIVE EFFECTS AND IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES**

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#### **4.2 SCOPE OF CUMULATIVE EFFECTS ANALYSIS**

#### **4.2.1 Past , Present, and Future Actions**

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**Air Quality.**

**Soils and Water Resources.**

**Biological Resources.**

**Socioeconomics.**

**Land Management and Use.**

**Hazardous Materials and Waste Management.**

#### **4.3 IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES**

## CHAPTER 5

### REFERENCES CITED

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## CHAPTER 5

### REFERENCES CITED

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*Wildlife Society Bulletin,*



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## **CHAPTER 6**

### **PERSONS AND AGENCIES CONTACTED**

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## **CHAPTER 6**

### **PERSONS AND AGENCIES CONTACTED**

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**Intergovernmental Coordination for Environmental Planning (IICEP) Coordination**

## **CHAPTER 7**

### **LIST OF PREPARERS AND CONTRIBUTORS**

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## CHAPTER 7

### LIST OF PREPARERS AND CONTRIBUTORS

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*Biology, Administration Support*

*Project Manager*

*Production Coordinator*

*Infrastructure, Hazardous Materials and Waste*

*Air Quality*

*QA/QC*

*Graphics*

*Program Manager*

*Socioeconomics*

## **APPENDIX A**

# **INTERAGENCY AND INTERGOVERNMENTAL COORDINATION FOR ENVIRONMENTAL PLANNING CORRESPONDENCE AND PUBLIC PARTICIPATION**

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**INTERAGENCY AND  
INTERGOVERNMENTAL COORDINATION FOR  
ENVIRONMENTAL PLANNING SCOPING  
LETTERS**

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DEPARTMENT OF THE AIR FORCE  
99TH CIVIL ENGINEER SQUADRON (ACC)  
NELLIS AIR FORCE BASE, NEVADA

Ms. Deborah Stockdale  
99 CES/CEA  
4349 Duffer Dr, Suite 1601  
Nellis AFB, NV 89191-7007

Nevada State Clearinghouse  
Department of Administration  
209 East Musser Street, Room 200  
Carson City, NV 89701-4298

Mesdames, Gentlemen

The United States Air Force is preparing a draft Environmental Assessment (EA) for the proposed action to construct a gas station at Creech AFB. The proposed gas station would provide the gasoline refilling service to the base population and retirees. The proposed gas station would consist of a one pump, two hose filling station on a concrete slab with a weather overhang, and an underground gasoline storage tank with all the proper containment measures and permits.

In addition to the proposed action, the EA will assess alternatives to the proposed action which include two other on-base locations, an aboveground storage tank, and the no-action. Under the no-action alternative the proposed gas station would not be constructed. In support of this process, we are requesting input in identifying general or specific issues or areas of concern you feel should be included in the environmental analysis.

Please forward any identified issues or concerns to Ms. Julieann Dwyer at the above address by 27 February 2009 or e-mail her at [julieann.dwyer@nellis.af.mil](mailto:julieann.dwyer@nellis.af.mil). Thank you for your





DEPARTMENT OF THE AIR FORCE  
99TH CIVIL ENGINEER SQUADRON (ACC)  
NELLIS AIR FORCE BASE, NEVADA

Ms. Deborah Stockdale  
99 CES/CEA  
4349 Duffer Dr, Suite 1601  
Nellis AFB, NV 89191-7007

Ms. Jennifer Olsen  
Southern Nevada Regional Planning Coalition  
240 Water Street, Mail Stop 115  
Henderson, NV 89009

Dear Ms. Jennifer Olsen

The United States Air Force is preparing a draft Environmental Assessment (EA) for the proposed action to construct a gas station at Creech AFB. The proposed gas station would provide the gasoline refilling service to the base population and retirees. The proposed gas station would consist of a one pump, two hose filling station on a concrete slab with a weather overhang, and an underground gasoline storage tank with all the proper containment measures and permits.

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Please forward any identified issues or concerns to Ms. Julieann Dwyer at the above address by 27 February 2009 or e-mail her at [julieann.dwyer@nellis.af.mil](mailto:julieann.dwyer@nellis.af.mil). Thank you for your participation.

Sincerely

A handwritten signature in cursive script that reads "Deborah Stockdale".

Deborah Stockdale  
Chief, Asset Management

*Global Power For America*



DEPARTMENT OF THE AIR FORCE  
99TH CIVIL ENGINEER SQUADRON (ACC)  
NELLIS AIR FORCE BASE, NEVADA

station would consist of a one pump, two hose filling station on a concrete slab with a weather overhang, and an underground gasoline storage tank with all the proper containment measures and permits.

In addition to the proposed action, the EA will assess alternatives to the proposed action which include two other on-base locations, an aboveground storage tank, and the no-action. Under the no-action alternative the proposed gas station would not be constructed. In support of this process, we are requesting input in identifying general or specific issues or areas of concern you feel should be included in the environmental analysis.

Please forward any identified issues or concerns to Ms. Julieann Dwyer at the above address by 27 February 2009 or e-mail her at [julieann.dwyer@nellis.af.mil](mailto:julieann.dwyer@nellis.af.mil). Thank you for your participation.

Sincerely

Deborah Stockdale  
Chief, Asset Management

*Global Power For America*

**From:** Nevada State Clearinghouse [Clearinghouse@budget.state.nv.us]  
**Sent:** Wednesday, February 25, 2009 11:41 AM  
**To:** Dwyer, Julieann T Civ USAF ACC 99 CES/CEAO  
**Subject:** - E2009 200 Proposed gas station at Creech AFB US Air Force

<[http://budget.state.nv.us/images/state\\_seal.jpg](http://budget.state.nv.us/images/state_seal.jpg)> NEVADA STATE  
CLEARINGHOUSE  
Department of Administration, Budget and Planning Division  
209 East Musser Street, Room 200, Carson City, Nevada 89701-4298  
(775) 684-0213 Fax (775) 684-0260

Nellis Air Force Base

Nevada SAI # E2009-200 Supplemental Memo

Project: Proposed gas station at Creech AFB

Updated 2/25/2009  
Project location map  
A map of the proposed project location has been added to the PDF.

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Follow the link below to access documents concerning the above-mentioned project.

E2009-200  
<<http://budget.state.nv.us/clearinghouse/Notice/2009/E2009-200.pdf>>

Questions? Reese Tietje, (775) 684-0213 or [clearinghouse@state.nv.us](mailto:clearinghouse@state.nv.us)  
<<mailto:clearinghouse@budget.state.nv.us>>

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**From:** Brad Hardenbrook [bhrdnbrk@ndow.org]  
**Sent:** Wednesday, February 18, 2009 12:57 PM  
**To:** Dwyer, Julieann T Civ USAF ACC 99 CES/CEAO  
**Subject:** Proposed Gas Station at Creech AFB: Scoping for Development of Environmental Assessment

Dear Ms. Dwyer,

I received notice of the scoping for the proposed project at Creech AFB by the Nevada State Clearinghouse. The notice included a copy of Deborah Stockton's summary letter describing the purpose of the proposed gas station. Unfortunately, identification of where the proposed site or alternative sites would occur are not detailed enough to ascertain whether construction would occur, for example, on previously developed, disturbed ground in a highly utilized area, or on relatively undisturbed desert located more distantly from existing high use and accessible areas. Could you provide some insights as to the nature of the locations under consideration? This perspective would assist the Department in better understanding the proposed gas station relative to local wildlife resources.

Thank you,

Brad

*"Do you not know that when in the service, one must always choose the lesser of two weevils?"* - CAPT. "LUCKY" JACK AUBREY

D. Bradford Hardenbrook  
Supervisory Habitat Biologist  
Southern Region  
Nevada Department Wildlife  
4747 Vegas Drive  
Las Vegas, NV 89108  
702/486-5127 x3600  
486-5133 FAX  
[bhrdnbrk@ndow.org](mailto:bhrdnbrk@ndow.org)

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*Notice of Availability  
Draft Environmental Assessment  
For Creech AFB AAFES Gas Station*

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## DISTRIBUTION LIST

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Indian Springs, NV 89018

Mr. Mario Bermudez, Planning Manager  
Clark County Department of Comprehensive Planning  
P.O. Box 551744  
Las Vegas, NV 89155

Commissioner Rory Reid, Chairperson  
Clark County Commission  
500 Grand Central Parkway  
Las Vegas, NV 89106

Nevada State Clearinghouse  
Department of Administration  
209 East Musser Street, Room 200  
Carson City, NV 89701-4298

Ms. Jennifer Olsen  
Southern Nevada Regional Planning Coalition  
240 Water Street, Mail Stop 115  
Henderson, NV 89009

Mr. Robert Williams, State Supervisor  
U.S. Fish and Wildlife Service  
Nevada Ecological Field Office  
1340 Financial Blvd, Suite 234  
Reno, NV 89502

\* Indian Springs Civic Association  
P.O. Box 1  
Indian Springs, NV 89018

\* Mr. Lewis Wallenmeyer  
Clark County Department of Air Quality and Environmental Management  
P.O. Box 555210  
Las Vegas, NV 89155

\* Added to Final EA Distribution List

# **SAMPLE DISTRIBUTION LETTER**

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DEPARTMENT OF THE AIR FORCE  
99TH CIVIL ENGINEER SQUADRON (ACC)  
NELLIS AIR FORCE BASE, NEVADA

Ms. Deborah C. Stockdale  
99 CES/CEA  
4349 Duffer Dr, Suite 1601  
Nellis AFB, NV 89191-7007

APR 08 2009

Indian Springs Town Advisory Board  
P.O. Box 12  
Indian Springs, NV 89018

Mesdames, Gentlemen

The Draft Environmental Assessment (EA) and Draft Finding of No Significant Impact (FONSI) for the proposal of a new Army and Air Force Exchange Service Gas Station at Creech Air Force Base (AFB), Nevada is attached for your review and comment. The proposed action would provide gasoline refilling service to Creech AFB personnel and retirees. The proposed gas station would consist of a single pump filling station on a concrete slab with a weather overhang. Gasoline would be stored in an underground storage tank meeting regulations for spill containment measures.

In this draft EA, three locations have been assessed, the preferred location and two alternative locations. In addition, a no-action alternative has been assessed in which the proposed gas station would not be constructed.

In accordance with 32 CFR 989, the Air Force *Environmental Impact Analysis Process (ELAP)*, and 40 CFR 1500-1508, the *Council on Environmental Quality* guidelines, pursuant to the *National Environmental Policy Act*, as amended, Nellis AFB requests your agency review the assessment of the proposed action. If you have any comments, please direct these to Ms. Julieann Dwyer at the following e-mail address: [Julieann.dwyer@nellis.af.mil](mailto:Julieann.dwyer@nellis.af.mil) or send your letter to the address listed above. Comments should be received by May 18, 2009. Thank you for your participation.

Sincerely

Deborah C. Stockdale  
Chief, Asset Management Flight

Attachment  
Draft Environmental Assessment and FONSI

---



# Indian Springs Town Advisory Board

P. O. Box 12  
Indian Springs, NV 89018-0012

May 18, 2009

99 CFS/CFAO

Ms. Julieann Dwyer  
4349 Duffer Drive, Suite  
Nellis AFB NV 89191

Dear Ms. Dwyer:

are a summary of the comments made at the Indian  
meeting on May 14 regarding the Draft EA for the  
Force Base. Thank you and the others for  
s an opportunity to discuss this project with  
consideration in extending the deadline to submit

The following two pages  
SPRING TOWN ADVISORY BOARD IN  
AAFES Gas Station at Creech Air  
attending the meeting, giving us  
you. We also appreciate your com  
comments to May 20.

e contact me at (702) 879-3376.

If you have any questions please

Sincerely,

A handwritten signature in cursive script that reads "Ann Brauer".

Ann Brauer, Chair

2009)

(Transmitted by email, May 18, 2009)

At the Town Board meeting it was stated that there is a feasibility study that was conducted for the gas station at Creech AFB. The Board would like to receive this study.

1

Because the DEA, especially the socioeconomic portion, is flawed, a full EIS should be conducted.

2

The relationship between the base and community is not addressed in the DEA. It is an important factor that should be considered.

3

The IISAF should attempt to negotiate a "military rate" with the Indian Springs

4

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At the meeting it was estimated that just less than 50 percent of the personnel

on base are non-military, yet they would have access to the gas station since all that is required is a Creech AFB identification required, thus enabling nonmilitary personnel to buy gas at the base gas station. This will have impacts on the community those reported in the DEA.

loss of fuel sales at the two gas stations of personnel associated with the potential losses is not supported by evidence. Can the losses be offset? Where are the offsetting gains? In the short term, depending on the size of the amount of loss

Was a study conducted to determine the impact of the gas stations in Indian Springs? If not, one should be.

prices at Nellis AFB are determined by the market. How will prices be affected?

It was stated at the meeting that base prices will be determined by averaging the prices at the five nearest gas stations determined at Creech AFB?

already exist in the adjacent community. Reported at the Town Board meeting

The cost of building duplicate facilities in the community does not seem justified. It is estimated that it will take 21 years to pay back the investment.

further negatively impact the local economy and the relationship they have, the USAF has a responsibility to the community.

If more pumps are added in the future to the community businesses and jobs. Because of the close relationship between the community and the base, and the close responsibility to the community and its businesses.

the base that are also needed in the community do not develop in the community are too small.

Historically, building of facilities/services in the community has meant those facilities/services are built in the community because the community needs them.

the basis of the conclusions drawn from the comments made at the Indian Springs Town Board meeting. Qualitative information was used. The impact on the local community businesses and jobs in qualitative terms, but only undefined

There are no quantitative data presented on socioeconomic impacts, according to the Town Board meeting on May 14, 2009. This does not realistically evaluate impacts on the community and jobs. Nor are the impacts stated in qualitative terms.

**Indian Springs Town Advisory Board Comments and Responses to the Creech Gas Station DEA**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
1	At the Town Board meeting it was stated that there is a feasibility study that was conducted for the gas station at Creech AFB. The Board would like to receive this study.	An internal AAFES Project Planning Questionnaire was performed to evaluate the practicality of the proposed project. A Project Validation Assessment or feasibility study was not performed for this project as it is not a requirement for an AAFES project with this limited scope.
2	Because the DEA, especially the socioeconomic portion, is flawed, a full EIS should be conducted.	Socioeconomic impacts are considered under NEPA as indirect impacts (40 CFR 1508.8) and, as such, are provided as contextual information to the analysis. CEQ regulations (40CFR 1508.14) further states that "...economic or social effects are not intended by themselves to require preparation of an environmental impact statement. " All other impacts associated with the proposal are clearly less than significant, therefore an EIS is not warranted.
3	The relationship between the base and the community is not addressed in the DEA. It is an important factor that should be considered.	Command understands that the community and the installation's success are inextricably linked. As such, we are sensitive to community needs, but must balance these priorities with force protection and convenience concerns specific to the base. Years of service and support has taught AAFES that what is good for the personnel on installation is typically good for the community as a dependable infrastructure is a critical concern in times of base realignment and closure discussions.



4	The USAF should attempt to negotiate a "military rate" with the Indian Springs Stations rather than build a station on base. There is also a gas station at Snow Mountain Reservation which could be approached about a military discount.	Although a rate might be negotiated, not building an on-site gas station would not fulfill the purpose and need for the AAFES gas station.
5	East gate issues, especially safety, are not addressed. With gasoline tankers using this exit/entrance, safety issues increase. There are no deceleration/acceleration lanes on US95; all vehicles must directly enter the flow of traffic which is travelling at 45 miles per hour or more.	The addition of an occasional fuel delivery truck would not appreciably affect the safety issues at the east gate. Expected sales are about 9,000 gallons per month. With delivery trucks carrying between 5,000 gallons and 7,000 gallons, this is less than two trips per month. A separate NEPA document is currently underway to address east gate modifications. This action is a separate action and independent from the decision to construct a gas station on Creech AFB.
6	<p>There are conflicting figures given in the socioeconomic section: such as 40-cents price difference with Las Vegas, and elsewhere a 10-30 cent difference.</p> <p>The current difference is about 10-15 cents. Were any studies done to verify these figures, and what was the trend in gas prices when the studies were conducted? It is more meaningful to compare percent higher or lower than cost per gallon.</p>	<p>During the summer of 08, observations made indicated price differences in the 40 cents per gallon range.</p> <p>See comment #13 for the methodology for setting prices. This will be added to the final EA.</p> <p>Cost comparisons were based on observations not formal studies.</p>
7	It is stated that the station is necessary to provide 24/7 availability of gasoline. One of the stations in Indian Springs is open 24/7. There is also a gas station at the Snow Mountain reservation between Indian Springs and Las Vegas.	Part of the purpose of this action is to have a secure, on-base source for gasoline. While there are gas stations open 24/7 they do not meet the need of those on-base with security requirements for this action.
8	The DEA indicates "gas station attendant's shack" (pg 2-2), but we were told there would be no attendant. It is unacceptable to have an unmanned "station" with only voluntary alarms to the fire department in case of a spill. Spills contribute to both air and water pollution. This is not addressed in the draft EA.	Unattended gas stations are common and spills are not a common incident. In fact, the current military vehicle gas station on Creech AFB is unattended. There would be spill kits provided at the pump and placard with instructions in case of a spill. There are spill control measures in place on Creech AFB to adequately address gas spills. Fuels spills from gas

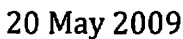
		<p>station pumps rarely occur in sufficient quantities to have any impact to air or water resources.</p> <p>The gas pump design would have automatic shut-off valves at either end of the hose, a shear valve at the base of the pump and an electronic sensor under the bottom of the dispenser to shut off the gasoline pump in the event it detects gasoline. Even if all four cut-off systems were to fail and a catastrophic leak were to occur, impacts would be localized and any fuel entering into the ground-water system would not impact drinking water systems because ground water follow is towards the northeast away from all of the local wellheads.</p> <p>In addition, security cameras are to be implemented at this site location.</p>
9	<p>The DEA states that the station will serve military personnel, their dependents, and retirees. What study or survey was conducted to determine the number of each group that would use the station? How many of these people currently use the stations in Indian Springs, and do they purchase fuel only, or other items as well? If such a study was not conducted, it should be.</p>	<p>A poll was taken on 10 June 2009 in response to this comment by the 432<sup>nd</sup> WG. Approximately 1600 personnel are assigned to the wing, but because of deployments, leave etc., 571 responses were received. The poll asked "How often have you utilized the Indian Springs gas stations in the past three months?" 39 percent said they never used the gas station; 41 percent said 1-5 times; 13 percent used the gas station 6-10 times; and 7 percent used the gas stations over 10 times.</p> <p>While retirees and dependents would be allowed to use the gas station, the amount gas sold to these groups would be minimal. There is no on-base family housing; therefore there are no dependents on base. Other than retirees living in Indian Springs, retirees would not likely use the gas station because of its remote location and lack of other services at Creech AFB.</p>

10	<p>If personnel buy gas on base, there is no reason for them to visit the local stations where they are buying other items such as food and drink items. If there is less use of these businesses, local jobs will disappear. Sales tax revenues to the community will be reduced.</p>	<p>AAFES, as a U.S. Government instrumentality, is immune from state and local taxes unless the immunity is waived by an act of Congress. The U.S. Congress has waived this immunity with respect to motor fuel sold by AAFES (Hayden Cartwright Act, 4 U.S.C. 104). AAFES pays Federal tax as well (26 U.S.C. § 4081(a) is the US code that covers Federal Tax on gasoline). Accordingly, AAFES pays state, federal and local motor fuel taxes, as well as underground storage fees, etc. on motor fuel. The federal and state motor fuel taxes and other applicable fees paid by AAFES are included in the motor fuel price to the military customer and paid to the appropriate taxing authority.</p>
11	<p>At the meeting it was estimated that just less than 50 percent of the personnel on base are non-military, yet they would have the ability to buy gas at the base gas station since all that is required is a credit card. There will be no military identification required, thus enabling nonmilitary personnel to buy gas at the station. This will have impacts of the community gas station, and jobs, beyond those reported in the DEA.</p>	<p>The impacts analyzed in the EA are based upon gasoline throughput and not who purchases the gas.</p> <p>Patronage is controlled in several ways for unattended fueling. We are on a secure facility, where the general public is not admitted. Our primary control is to post clear signage that the facility is for authorized patrons only. Then on a random basis, we have an associate present to spot check identification for sales.</p> <p>In addition, security cameras would be implemented at this location.</p>
12	<p>It is stated that the station on base "may result in a loss of fuel sales at the two gas stations in Indian Springs; however, the influx of personnel associated with the UAS force structure changes would likely offset the potential losses resulting in no significant impact. "This statement is not supported by evidence. What is a "significant" impact? How will the impact be offset? Where are the studies to support this? "significant impact" is a relative term, depending on the size of the financial base being impacted. How does the amount of loss compare to the total tax</p>	<p>Will revise to state minimal impact. There is no CEQ requirement to state whether socioeconomic impacts are significant. The impacts will be offset by the several hundred personnel that have yet to be transferred or employed at Creech by 2013. Some of these additional personnel would purchase products from the local gas stations. The amount of loss compared to tax revenue is impossible to quantify</p>

	revenue currently earned? Was a study conducted to determine how many personnel use the stations in Indian Springs? If not, one should be.	because records do not exist stating how much revenue generated is specifically from those military members that might use the proposed gas station.
13	It was stated at the meeting that the base gas prices at Nellis AFB are determined by averaging the prices at the five nearest stations. How will prices be determined at Creech AFB?	The AAFES gas policy requires AAFES stations in the Continental United States to survey as frequently as necessary to stay competitive, a minimum of 5 competitor locations selling motor fuel, establishing the AAFES price equal to the lowest price surveyed for each grade of fuel AAFES sells. Creech AFB, AAFES would use the Nellis AFB sell price established by the process outlined above as the benchmark. To this benchmark AAFES will add the additional freight expense, estimated to be 5 cents per gallon. Thus, the Creech AFB sell price will match the Nellis AFB sell price / plus freight (or approx. plus 5 cents per gallon).
14	The cost of building duplicate facilities that already exist in the adjacent community does not seem justified. It was reported at the Town Board meeting that it will take 21 years to pay back the costs.	While cost to build infrastructure is taken in to consideration, the needs of the installation are of primary importance to AAFES. With locations from Baghdad to Ft. Bragg, AAFES often must operate some facilities at a loss. As such, the "bottom line" isn't always the determining factor when deciding where and when to place services on a military installation. In addition, the cost to build the facility will be paid for by exchange patrons as AAFES earnings are utilized to build new stores or renovate existing facilities. Funds to build these new or replacement facilities come entirely from the sale of merchandise and services.
15	If more pumps are added in the future it will negatively impact community businesses and jobs. Because of the close proximity and the community and the base, and the close relationship they have, the USAF has the responsibility to the community and its well-being.	There are no plans to add any additional pumps than those stated in the DEA.

16	Historically, building of facilities/services on the base that are also needed in the community has meant those facilities/services do not develop in the community because the community numbers are too small.	Noted, but this is beyond the scope of this document.
17	There are no quantitative data presented as the basis of the conclusions drawn on socioeconomic impacts, according to statements made at the Indian Springs Town Board meeting on May 14, 2009. Only qualitative information is used. This does not realistically evaluate the impacts to the local community businesses and jobs. Nor are the impacts stated in quantitative terms. But only in undefined qualitative terms.	<p>The EA states AAFES expects to sell 50,000 gallons per week from the Creech gas station (Nimmers 2009).</p> <p>This figure was in error, 9,000 gallons per month is the correct figure. The final EA will be modified to reflect this change.</p> <p>The only quantitative analysis that can be done is state that 9,000 gallons would not have been purchased elsewhere. Most will be from gas stations in the northwest part of Las Vegas valley, some from the Nellis AAFES gas station, some from other locations around Las Vegas and some from Indian Springs. It is impossible to definitively pinpoint where people would not buy gas when they are using the Creech AFB station and would be speculative at best.</p>

Indian Springs, Nevada 89018



**Johnnie E. Lewis,**  
**President, Indian Springs Civic Association**

**Please add the following  
may affect the community**

**The FONSI should be set aside in favor of the no Action alternative.**

**Socioeconomic concerns:**

1. Neither the full short term nor long term socioeconomic impact to the community of Indian Springs has been addressed.
2. Indian Springs is a small community that is greatly affected by even small changes. The DEA does not address the magnitude of taking sales of gasoline and collateral commodities (candy, cigarettes, beverages, etc.) from the community and county.
3. The losses to the community once the government has taken over a function tend to be irreversible, especially in small communities. Indian Springs has already experienced this throughout the last 40 years of its relationship with the local air base. The businesses along US 95, mostly located on the north side of the highway, are the major commercial enterprises for Indian Springs. Any action which decreases their success or profit is detrimental to the community.
4. On page 3-9 of the DEA the figure of 50,000 gallons per year is used to figure the air pollution created. Later, on page 3-18, the figure of 50,000 gallons per month is given. This difference in the annual/monthly throughput figures makes it difficult to realistically predict the socioeconomic impacts to the community of Indian Springs, its businesses and related jobs.
5. The trucking of gasoline into the substandard East Gate from US 95, which has no acceleration or deceleration lanes, is a large safety concern. The speed limit there is 45 miles per hour, and there is no way a truck leaving the base can enter traffic in either direction at that speed, and slowing down to turn into the gate area from either direction also creates a hazard to the traffic in the area which usually is traveling above the 45 mph speed limit.
6. We understand that there will be no attendant at the proposed station, which means no potential for employment, no on-site monitoring of spills, and no enforcement of military only access to the pumps. Anyone with a credit card that is on base will be able to use the pumps, so the station is not a military benefit as portrayed in the DEA. Furthermore there is no provision for needed safety items such as air, water, windshield cleaning, etc.
7. The DEA reports varying figures for the difference between prices of gasoline in Indian Springs and Las Vegas, where the personnel are coming from. There is no compelling reason to buy fuel in Indian Springs, except diesel when its price is lower in Indian Springs, which has been frequently over the last several months. Furthermore, the study of the gas prices was done at the peak of per gallon costs rather than over a more normal period of time.
8. Reporting the price comparison in terms of cents per gallon does not give a realistic way to understand the difference in prices. A percentage greater or less than the prices in Las Vegas would give more meaning to the comparison.

**In addition to the socioeconomic shortcoming of the DEA, there appears to be no compelling justification for the proposed station:**

1. There is no military housing here. Most of the personnel, both civilian and military, live in Las Vegas where fuel prices are lower. People usually choose to purchase gas where it is cheaper, and certainly before embarking on a 40-mile (one way) or more commute to work. Also, military representatives have stressed to the community on repeated occasions that there is no guarantee of permanence to Creech AFB, or its current mission. With a 21 year pay back for costs of putting in the station, it appears to be unjustified. Someone, somewhere will have to be subsidizing the station.

2. No alternatives were explored, such as securing a military discounts at the stations in Indian Springs, as well as the intermediate station at the Snow Mountain Piute Reservation station. Nor was there any mention of carpooling or busing to relieve the costs of the commute.

**Should the project be carried forward, we request a full EIS be conducted, at least with respect to socioeconomic issues.**



**Indian Springs Civic Association Comments and Responses to the Creech Gas Station DEA**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
1	Neither the full short term nor long term socioeconomic impact to the community of Indian Springs has been addressed.	Socioeconomic impacts are considered under NEPA as indirect impacts (40 CFR 1508.8) and, as such, are provided as contextual information to the analysis. CEQ regulations (40CFR 1508.14) further states that "...economic or social effects are not intended by themselves to require preparation of an environmental impact statement. "All other impacts associated with the proposal are clearly less than significant; therefore an EIS is not warranted.
2	Indian Springs is a small community that is greatly affected by even small changes. The DEA does not address the magnitude of taking sales of gasoline and collateral commodities (candy, cigarettes, beverages, etc.) from the community and county.	The magnitude of the change in business is not exactly known, the EA estimates the amount of business loss will be minimal. The base population has nearly tripled in the past few years and some of the new personnel shop at the local businesses. The addition of a single two hose gas pump is not expected to drop local revenues to pre-buildup levels.
3	The losses to the community once the government has taken over a function tend to be irreversible, especially in small communities. Indian Springs has already experienced this throughout the last 40 years of its relationship with the local air base. The businesses along US 95, mostly located on the north side of the highway, are the major commercial enterprises for Indian Springs. Any action which decreases their success or profit is detrimental to the community.	Command understands that the community and the installation's success are inextricably linked. As such, we are sensitive to community needs, but must balance these priorities with force protection and convenience concerns specific to the base. Years of service and support has taught AAFES that what's good for the personnel on installation is typically good for the community as a dependable infrastructure is a critical concern in times of base realignment and closure discussions.
4	On page 3-9 of the DEA the figure of 50,000 gallons per year is used to figure the air pollution created. Later, on page 3-18, the figure of 50,000 gallons per	The 50,000 gallons per <u>month</u> mentioned in the DEA was incorrect. The original estimates indicate the

	month is given. This difference in the annual monthly throughput figures makes it difficult to realistically predict the socioeconomic impacts to the community of Indian Springs, its businesses and related jobs.	amount would be closer to 9,000 gallons per month. The EA will be revised accordingly.
5	The trucking of gasoline into the substandard East Gate from US 95, which has no acceleration or deceleration lanes, is a large safety concern. The speed limit there is 45 miles per hour, and there is no way a truck leaving the base can enter traffic in either direction at that speed, and slowing down to turn into the gate area from either direction also creates a hazard to the traffic in the area which usually is traveling above the 45 mph speed limit.	The addition of an occasional fuel delivery truck would not appreciably affect the safety issues at the East Gate. Expected sales are about 9,000 gallons per month. With delivery trucks carrying between 5,000 gallons and 7,000 gallons, this is less than two trips per month. A separate NEPA document is currently underway to address East Gate modifications. This action is a separate action and independent from the decision to construct a gas station on Creech AFB.
6	We understand that there will be no attendant at the proposed station, which means no potential for employment, no on-site monitoring of spills, and no enforcement of military only access to the pumps. Anyone with a credit card that is on base will be able to use the pumps, so the station is not a military benefit as portrayed in the DEA. Furthermore there is no provision for needed safety items such as air, water, windshield cleaning, etc.	Unattended gas stations are common and spills are not a common incident. In fact, the current military vehicle gas station on Creech AFB is unattended. There will be spill kits provided at the pump and placard with instructions in case of a spill. There are spill control measures in place on Creech AFB to adequately address gas spills. Fuels spills from gas station pumps rarely occur in sufficient quantities to have any impact to air or water resources.  The gas pump design would have automatic shut-off valves at either end of the hose, a shear valve at the base of the pump and an electronic sensor under the bottom of the dispenser to shut off the gasoline pump in the event it detects gasoline. Even if all four cut-off systems were to fail and a catastrophic leak were to occur, impacts would be localized and any fuel entering in the ground-water system would not impact drinking water systems because ground water flow is towards the northeast away from all of the local wellheads..
7	The DEA reports varying figures for the difference between prices of gasoline in Indian Springs and Las Vegas, where the personnel are coming from. There	The AAFES gas station will be unleaded only.

	is no compelling reason to buy fuel in Indian Springs, except diesel when its price is lower in Indian Springs, which has been frequently over the last several months. Furthermore, the study of the gas prices was done at the peak of per gallon costs rather than over a more normal period of time.	
8	Reporting the price comparison in terms of cents per gallon does not give a realistic way to understand the difference in prices. A percentage greater or less than the prices in Las Vegas would give more meaning to the comparison.	The price difference is acquired by observation at various times. The most glaring was in the summer of 2008 when the gas price was nearly 50 cents a gallon higher in Indian Springs.
9	There is no military housing here. Most of the personnel, both civilian and military, live in Las Vegas where fuel prices are lower. People usually choose to purchase gas where it is cheaper, and certainly before embarking on a 40-mile (one way) or more commute to work. Also, military representatives have stressed to the community on repeated occasions that there is no guarantee of permanence to Creech AFB, or its current mission. With a 21 year pay back for costs of putting in the station, it appears to be unjustified. Someone, somewhere will have to be subsidizing the station.	While cost to build infrastructure is taken in to consideration, the needs of the installation are of primary importance to AAFES. With locations from Baghdad to Ft. Bragg, AAFES often must operate some facilities at a loss. As such, the "bottom line" isn't always the determining factor when deciding where and when to place services on a military installation. Furthermore, the cost to build the facility will be paid for by exchange patrons as AAFES earnings are used to build new stores or renovate existing facilities. Funds to build these new or replacement facilities come entirely from the sale of merchandise and services.
10	No alternatives were explored, such as securing military discounts at the stations in Indian Springs, as well as the intermediate station at the Snow Mountain Piute (sic) Reservation station. Nor was there any mention of carpooling or busing to relieve the costs of the commute.	The objective of the action is to provide an on-base alternative which is secure and more convenient for the military members who are required to work long shifts and have to be at work every day. Relying on outside sources for gasoline would not meet the purpose and need for this action. A sizable percentage already arrives at Creech by bus or carpool. The purpose of this action is not solely based on gas prices.
11	Should the project be carried forward, we request a full EIS be conducted, at least with respect to socioeconomic issues.	See response to comment #1.



# DAQEM

## DEPARTMENT OF AIR QUALITY & ENVIRONMENTAL MANAGEMENT

500 S Grand Central Parkway 1st Floor · Box 555210 · Las Vegas, NV 89155-5210  
(702) 455-5942 · Fax (702) 383-9994

Lewis Wallenmeyer Director · Alan Pinkerton Assistant Director · Tina Gingras Assistant Director

May 15, 2009

99 ABW/PA  
4430 Grissom Ave  
Nellis AFB, NV 89191  
ATTN: Michael Estrada

**RE: Environmental Assessment of Army & Air Force Exchange Service Gas Station at Creech Air Force Base**

Dear Mr. Estrada,

The Clark County Department of Air Quality and Environmental Management has reviewed the subject Environmental Assessment (EA). We understand that the Army and Air Force Exchange Service (AAFES) proposes to build a gas station at Creech Air Force Base consisting of a single pump filling station on a concrete slab with a weather overhang and an underground storage tank.

We suggest the AAFES obtains a dust control permit before beginning any construction on a site that may impact an area equal to or greater than 0.25 acre. Also, air quality regulations require a stationary source permit be obtained before construction of any unit at a source that emits a regulated pollutant into the ambient air. We also require that the AAFES adheres to all provisions of all applicable dust control and stationary source permits.

General

The Air Program offers the following further comments to correct statements in the EA:

1. On page 3-7, lines 22-25 the EA describes the Las Vegas Valley as an attainment area for ozone ( $O_3$ ). However, on September 15, 2004, portions of Clark County, including the Las Vegas Valley, were designated nonattainment for  $O_3$ . In December 2006, the U.S. Court of Appeals for the District of Columbia Circuit vacated the U.S. Environmental Protection Agency (EPA) rule classifying ozone nonattainment areas, remanding it back to EPA for correction. EPA has not finalized the revised rule, so the ozone nonattainment area has no formal classification at this time.
2. Two different throughputs are listed for the gas station. In the "Air Quality" section (page 3-9, line 33), the throughput is given as 50,000 gallons per year. However, in the "Socioeconomics" section (page 3-18, line 3), the throughput is given as 50,000 gallons per month. If the throughput is actually 50,000 gallons per month, the projected emissions in Table 3-2 would increase twelvefold (although the station would still be a minor source).



### BOARD OF COUNTY COMMISSIONERS

Rory Reid, Chairman · Susan Bringer, Vice Chairman

John B. Baker, Commissioner · David B. Berman, Commissioner · David B. Berman, Commissioner

William J. Berman, Commissioner · William J. Berman, Commissioner

Michael Estrada  
May 15, 2009  
Page 2

We appreciate the opportunity to review the proposed project. If you have any questions about these comments, please contact me at 702-455-1600.

Sincerely,

A handwritten signature in cursive script, reading "L. Wallenmeyer". The signature is written in dark ink and is positioned above the printed name and title.

Lewis Wallenmeyer  
Director

**Clark County DAQEM Comments and Responses to the Creech Gas Station DEA**

<b>Comment Number</b>	<b>Comment</b>	<b>Response</b>
General	We suggest the AAFES obtains a dust control permit before beginning any construction on a site that may impact an area equal to or greater than 0.25 acre. Also, air quality regulations require a stationary source permit be obtained before construction of any unit at a source that emits a regulated pollutant into the ambient air. We also require that the AAFES adheres to all provisions of all applicable dust control and stationary source permits.	All applicable permits would be obtained prior to construction and adhered to during construction and operation of the gas station.
1	On page 3-7, lines 22-25 the EA describes the Las Vegas Valley as an attainment area for ozone (O3). However, on September 15, 2004, portions of Clark County, including the Las Vegas Valley, were designated nonattainment for (O3). In December 2006, the U.S. Court of Appeals for the District of Columbia Circuit vacated the U.S. Environmental Protection Agency (EPA) rule classifying ozone nonattainment areas, remanding it back to EPA for correction. EPA has not finalized the revised rule, so the ozone nonattainment area has no formal classification at this time.	Paragraph 3.2.1 has been revised to reflect this comment.
2	Two different throughputs are listed for the gas station. In the "Air Quality" section (page 3-9, line 33), the throughput is given as 50,000 gallons per year. However, in the "Socioeconomics" section (page 3-18, line 3), the throughput is given as 50,000 gallons per month. If the throughput is actually 50,000 gallons per month, the projected emissions in Table 3-2 would increase twelvefold (although the station would still be a minor source).	The 50,000 gallons per year (and per month) figure was in error, 9,000 gallons per month is the correct throughput amount. The final EA will be modified to reflect this change.

## **APPENDIX B**

### **AIR QUALITY ANALYSIS**

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# APPENDIX B

## AIR QUALITY ANALYSIS

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### *LIQUID STORAGE TANKS*

*Tanks Emissions Estimation Software, Version 4.09D, 5 Oct 2006.*

### *CONSTRUCTION*

<i>Activity, and Load Factor Values for Nonroad Engine Emissions Modeling</i>	<i>Median Life, Annual Exhaust and</i>
<i>Crankcase Emission Factors for Nonroad Engine Modeling—Compression-Ignition</i>	
<i>Nonroad Engine and Vehicle Emission Study—Report</i>	<i>Exhaust Emission Factors for</i>
<i>Nonroad Engine Modeling—Spark-Ignition</i>	<i>Conversion Factors for Hydrocarbon</i>
<i>Emission Components</i>	<i>Comparison of Asphalt Paving Emission Factors</i>
<i>WRAP Fugitive Dust Handbook</i>	<i>Analysis of the Fine Fraction of Particulate Matter in</i>
<i>Fugitive Dust</i>	<i>Mobile 6.2.03</i>



**Off-Road Equipment Emissions.**

*Where*

*EMS*

*EF*

*HP*

*LF*

*Act*

*DF*

**Fugitive Dust.**

**PM<sub>10</sub>, PM<sub>2.5</sub>, and Mobile Sources.**

**VOC Emissions from Paving.**

**Construction Workers – Mobile Sources.**

**REFERENCES**

California Air Resources Board (CARB). 2005. Comparison of Asphalt Paving Emission Factors.

Midwest Research Institute (MRI). 2005. MRI Project No. 110397. Analysis of the Fine Fraction of Particulate Matter in Fugitive Dust, conducted for the Western Governors Association Western Regional Air Partnership (WRAP). October.

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